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Acting Under Authority Conferred by 28 U.S.C. § 515

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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Recorded Notice of Lis Pendens 3877-3879 Jackson Street, SF, CA 94118
CR 25-0012 RFL

1 The United States hereby submits the attached Recorded Notice of Lis Pendens as to Real
2 Property and Improvements located at 3877-3879 Jackson Street, San Francisco, California 94118
3 (APN Lot 019, Block 0990).

4 DATED: January 24, 2025

5 Respectfully submitted,

6 PATRICK D. ROBBINS
7 Acting United States Attorney

8 /S/
9 GREGG W. LOWDER
10 Assistant United States Attorney

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Northern District of California and is a person of such age and discretion to be competent to serve papers. The undersigned further certifies that she caused a copy of

- Recorded Notice of Lis Pendens as to Real Property and Improvements located at 3877-3879 Jackson Street, San Francisco, California 94118

to be served this date via United States certified mail and first class mail delivery upon the person(s) below at the place(s) and address(es) which is the last known address(es):

Scott D. Joiner
Latham & Watkins LLP
505 Montgomery Street, Suite 2000
San Francisco, CA 94111
Attorney for Alexander Beckman

Valerie Lau
3877-3879 Jackson Street
San Francisco, California 94118

Alexander Beckman
3877-3879 Jackson Street
San Francisco, CA 94118

Fidelity National Title Insurance Company
601 California Street, Suite 1501
San Francisco, CA 94108

First Republic Bank
111 Pine Street
San Francisco, CA 94111

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 24th day of January 2025, at San Francisco, California

Recorded Notice of Lis Pendens 3877-3879 Jackson Street, SF, CA 94118
CR 25-0012 RFL



**City and County of San Francisco
Joaquín Torres, Assessor-Recorder**

Doc #	2025006749	Fees	\$173.00
1/24/2025	7:35:52 AM	Taxes	\$0.00
ES	Electronic	Other	\$0.00
Pages	54	Title	030
		SB2 Fees	\$0.00
		Customer	2177
		Paid	\$173.00

RECORDING REQUESTED BY:

UNITED STATES ATTORNEYS OFFICE

WHEN RECORDED PLEASE MAIL TO:
AUSA DANIEL PASTOR
UNITED STATES ATTORNEYS OFFICE
450 GOLDEN GATE AVENUE, BOX 36055
SAN FRANCISCO, CA 94102
ATTN: ASSET FORFEITURE UNIT

(DOCUMENT WILL ONLY BE RETURNED TO NAME & ADDRESS ABOVE)

(SPACE ABOVE FOR RECORDER'S USE)

NOTICE OF LIS PENDENS AS TO REAL PROPERTY AND IMPROVEMENTS LOCATED AT
3877-3879 JACKSON STREET, SAN FRANCISCO, CA 94118 (APN: LOT 019; BLOCK 0990)

(DOCUMENT TITLE)

1 PATRICK D. ROBBINS (CABN 152288)
2 Attorney for the United States
3 Acting Under Authority Conferred by 28 U.S.C. § 515
4
5 MARTHA BOERSCH (CABN 126569)
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NOTICE IS HEREBY GIVEN that an action has been commenced in the above-entitled Court pursuant to an Indictment, a copy of which is attached hereto as Exhibit A, filed by the United States of America on January 21, 2025, to secure a judicial forfeiture of real property and improvements located at 3877-3879 Jackson Street, San Francisco, California 94118 (APN: Lot 019, Block 0990), and further described in Exhibit B, which is attached hereto.

111

Notice of Lis Pendens 3877-3879 Jackson Street, SF, CA 94118
CR 25-0012 RFL

The Indictment alleges that the said real property is subject to forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1), and 982(a)(2) and Title 28, United States Code, Section 2461(c) and Rule 32.2 of the Federal Rules and Criminal Procedure.

The owners of record to the said real property are Alexander Beckman, a single man, and Valerie Lau, a single woman.

DATED: January 23, 2025

Respectfully submitted,

PATRICK D. ROBBINS
Acting United States Attorney

/S/
DANIEL PASTOR
GREGG W. LOWDER
Assistant United States Attorneys

CERTIFICATE OF SERVICE

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- Notice of Lis Pendens as to Real Property and Improvements located at 3877-3879 Jackson Street, San Francisco, California 94118

to be served this date via United States certified mail and first class mail delivery upon the person(s) below at the place(s) and address(es) which is the last known address(es):

Alexander Beckman
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San Francisco, California 94118

Valerie Lau
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San Francisco, California 94118

First Republic Bank
111 Pine Street
San Francisco, CA 94111

Fidelity National Title Insurance Company
601 California Street, Suite 1501
San Francisco, CA 94108

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 23rd day of January 2025, at San Francisco, California

Exhibit A

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

UNITED STATES OF AMERICA,

v.

ALEXANDER CHARLES BECKMAN, and
VALERIE LAU BECKMAN a/k/a Valerie Lau

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 1343 – Wire Fraud; 18 U.S.C. § 1349 – Conspiracy to Commit Wire Fraud; 15 U.S.C. §§ 78j(b) and 78ff and 17 C.F.R. § 240.10b-5 – Securities Fraud; 18 U.S.C. § 371 – Conspiracy to Commit Securities Fraud; 18 U.S.C. § 1349 – Conspiracy to Commit Bank Fraud; 18 U.S.C. § 1014 – False Statement to a Bank; 18 U.S.C. § 1957 – Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity; 18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft; 18 U.S.C. § 1512(c)(1) – Obstruction of Justice; 18 U.S.C. § 2 – Aiding and Abetting; 18 U.S.C. §§ 981(a)(1)(C), 982(a)(1), 982(a)(2) and 28 U.S.C. § 2461(c) – Forfeiture Allegation

+

A true bill.

/s/ Foreperson of the Grand Jury

Foreman

Filed in open court this 21st day of

January, 2025

Julia Macias

Clerk

Debra M. Bell
Bail, \$ Warrants (2)

Hon. Peter H. Kang, U.S. Magistrate Judge

FILED

1 PATRICK D. ROBBINS (CABN 152288)
2 Attorney for the United States
3 Acting Under Authority Conferred by 28 U.S.C. § 515

Jan 21 2025

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

6
7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION

10 UNITED STATES OF AMERICA,) CASE NO. 3:25-cr-00012 RFL
11 Plaintiff,)
12 v.) VIOLATIONS:
13 ALEXANDER CHARLES BECKMAN, and) 18 U.S.C. § 1343 – Wire Fraud;
14 VALERIE LAU BECKMAN,) 18 U.S.C. § 1349 – Conspiracy to Commit Wire
15 a/k/a Valerie Lau,) Fraud;
16 Defendants.) 15 U.S.C. §§ 78j(b) and 78ff and 17 C.F.R.
17) § 240.10b-5 – Securities Fraud;
18) 18 U.S.C. § 371 – Conspiracy to Commit Securities
19) Fraud;
20) 18 U.S.C. § 1349 – Conspiracy to Commit Bank
21) Fraud;
22) 18 U.S.C. § 1014 – False Statement to a Bank or
23) Other Federally Insured Institution;
24) 18 U.S.C. § 1957 – Engaging in Monetary
25) Transactions in Property Derived from Specified
26) Unlawful Activity;
27) 18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft;
28) 18 U.S.C. § 1512(c)(1) – Obstruction of Justice;
29) 18 U.S.C. § 2 – Aiding and Abetting;
30) 18 U.S.C. §§ 981(a)(1)(C), 982(a)(1), 982(a)(2) and
31) 28 U.S.C. § 2461(c) – Forfeiture Allegation
32)
33 SAN FRANCISCO VENUE

INDICTMENT

INDICTMENT

The Grand Jury charges:

Introductory Allegations

At all times relevant to this Indictment:

Overview

6 1. From at least in or about September 2018 through in or about July 2024, defendant
7 ALEXANDER CHARLES BECKMAN used his position as GameOn, Inc.'s Chief Executive Officer
8 and one of its founders to defraud GameOn investors through a series of lies, half-truths, and misleading
9 statements and representations about GameOn's business. GameOn was a private business that offered
10 a software program commonly known as a chatbot that claimed on its website to be "the industry
11 leading enterprise-grade conversational AI platform, trusted by the world's leading brands in retail,
12 sports, and media & entertainment." Its customers included prominent American professional sports
13 teams, associations, and leagues as well as leading brands in fashion and retail. During the fraud scheme
14 alleged in this Indictment, BECKMAN raised over \$60 million from GameOn investors, and he raised a
15 total of over \$80 million since GameOn's 2014 founding.

16 2. BECKMAN's fraud scheme was brazen and wide-ranging. BECKMAN's statements to
17 GameOn investors often described revenue that never existed, cash balances that were vastly inflated,
18 and customer relationships that were not real and otherwise greatly exaggerated. BECKMAN lied about
19 his credentials, too, telling investors that his prior company was sold for far more than it actually was.
20 To further the scheme, BECKMAN used the names of at least seven real people—including fake emails
21 and signatures—without their permission and without lawful authority to distribute and share false and
22 fraudulent GameOn financial and business information and documents with the intent to defraud
23 GameOn investors and GameOn itself. BECKMAN also fabricated two GameOn audit reports using the
24 names, signatures, and trademarks of reputable accounting firms to validate GameOn financial
25 statements that BECKMAN knew to be false and fraudulent and created and distributed over a dozen
26 fake bank statements for GameOn's accounts as part of the scheme. In addition, BECKMAN made false
27 statements and promises to investors about how GameOn used and would use investor funds, diverting
28 millions of dollars from investors and GameOn to pay for BECKMAN's personal expenses.

1 3. Defendant VALERIE LAU BECKMAN, a/k/a Valerie Lau (“LAU”), was in a close
 2 personal relationship with BECKMAN for several years before marrying BECKMAN on a date known
 3 to the Grand Jury in October 2023. During the relevant period, LAU was an attorney who changed law
 4 firms multiples times before joining Venture Capital Firm 1 in or about September 2021, eventually
 5 becoming Venture Capital Firm 1’s General Counsel. From at least in or about 2016 through in or about
 6 2024, LAU worked on GameOn corporate and transactional matters.

7 4. Since at least in or about April 2022, LAU conspired with BECKMAN and knowingly
 8 and intentionally participated in the schemes to defraud alleged in this Indictment. LAU received fake
 9 documents from BECKMAN and reviewed them before he sent them and caused them to be sent to
 10 members of GameOn’s board of directors and GameOn investors. LAU knew BECKMAN created a
 11 fake audit report for GameOn in or about October 2023, and she nevertheless distributed that fake audit
 12 report to a GameOn investor’s representative in March 2024 to induce further investment into GameOn
 13 and saw BECKMAN distribute fake audit reports to other investors for the same purpose. When
 14 GameOn’s investors serving on its board of directors began to push BECKMAN for transparency
 15 regarding its corporate accounts, LAU furthered the scheme to defraud by personally and knowingly
 16 delivering a fake GameOn account statement—one that listed GameOn’s balance at Financial Institution
 17 1 as over \$13 million when GameOn’s true balance at Financial Institution 1 for that period was just
 18 \$25.93—to a bank branch in San Francisco and asking a bank employee to print the fake statement and
 19 keep it in an envelope at the bank for BECKMAN to pick up later that day. Later that afternoon,
 20 BECKMAN went to the same branch location with a GameOn director who wanted to see an account
 21 statement directly from the bank and picked up the fake statement knowingly planted there by LAU.
 22 Both LAU and BECKMAN knew this statement contained materially inflated balance information.
 23 When LAU’s employer, Venture Capital Firm 1, approached her in or about August 2024 regarding
 24 GameOn, LAU lied to Venture Capital Firm 1 about her work for GameOn and then attempted to delete
 25 hundreds of files relating to that GameOn work from Venture Capital Firm 1’s records at a time when a
 26 grand jury investigation into GameOn was pending and reasonably foreseeable to LAU.

27 5. Both BECKMAN and LAU used GameOn investor funds for their own personal benefit,
 28 including to make payments to BECKMAN’s minor children’s private school and to make payments at

1 the social club that served as their wedding venue and jewelry stores. BECKMAN and LAU also used
 2 GameOn investor funds to pay for luxury vehicles, personal property taxes, and private club
 3 memberships. Among the most significant examples though was when BECKMAN and LAU used
 4 approximately \$4.2 million of GameOn investor funds in or about April 2022 to purchase a personal
 5 residence in San Francisco. BECKMAN and LAU then tried to obtain a loan to pay back GameOn
 6 some of the money they took out of GameOn's corporate account, and to obtain that loan from Financial
 7 Institution 4, LAU knowingly created fake GameOn board of director meeting minutes falsely stating
 8 that GameOn's board had authorized BECKMAN to take out a multi-million-dollar personal loan
 9 pursuant to his status as a GameOn founder. The fake meeting minutes that LAU sent BECKMAN
 10 included the name and electronic signature of Board Secretary 1, a partner at Law Firm 1, where LAU
 11 previously worked. Shortly after receiving the false and fraudulent minutes from LAU, BECKMAN
 12 sent those minutes, which he knew to be false, to Financial Institution 4 so that Financial Institution 4
 13 could finalize BECKMAN and LAU's loan application.

14 Relevant Individuals and Entities

15 6. BECKMAN and LAU resided in the Northern District of California.

16 7. GameOn, also known as GameOn Technology, changed its name to ON Platform in or
 17 about October 2023, but the company continued to use the name GameOn in connection with investment
 18 contracts and corporate bank accounts into 2024. As a result, this Indictment uses the name GameOn to
 19 refer to the same company both before and after the October 2023 name change.

20 8. Investor 1 was an investment firm based in San Francisco, California.

21 9. Investor 2 was an investment firm based in New York, New York.

22 10. Investor 3 was an investment firm based in San Francisco, California.

23 11. Investor 4 was an investment firm based in New York, New York.

24 12. Investor 5 was an individual based in the Northern District of California.

25 13. Investor 6 was an investment firm based in the Northern District of California and
 26 elsewhere.

27 14. Consultant 1, Contractor 1, and CFO 1 were real people who worked with and for
 28 GameOn.

1 15. Board Secretary 1, who was a partner at Law Firm 1, and Board Secretary 2, who was a
2 former partner at Law Firm 1, were real people and attorneys who served at different times as secretary
3 for GameOn's board of director meetings.

4 16. League 1 was one of the four major American professional sports leagues and was in a
5 contractual relationship with GameOn through an entity that controlled League 1's media rights.
6 League 1 Employee 1 was a real person who worked on matters relating to GameOn for League 1.

7 17. Financial Institution 1, Financial Institution 2, Financial Institution 3, and Financial
8 Institution 4 operated in the Northern District of California and elsewhere.

9 18. Financial Advisor 1 and Financial Advisor 2 were real people who worked for Financial
10 Institution 1 in the Northern District of California.

11 19. Bank Employee 1 was an employee of Financial Institution 2 in the Northern District of
12 California.

GameOn's Business

14 20. During the relevant period, GameOn was a private company with its principal place of
15 business in San Francisco, California. GameOn opened and maintained corporate bank accounts at
16 Financial Institution 1, Financial Institution 3, and Financial Institution 4 in the Northern District of
17 California.

18 21. GameOn offered its customers a software program claiming artificial intelligence or AI
19 functionality that mimicked human conversation and interaction, commonly known as a chatbot or
20 simply “chat.” GameOn’s chatbot responded to natural language inquiries and other inputs, allowing its
21 customers to use the chatbot as a tool to engage with their own fans, customers, consumers, and other
22 members of the public.

23 22. GameOn developed business relationships with multiple major American professional
24 sports leagues, associations, and teams that used GameOn's chatbot. GameOn had contractual and
25 business relationships with multiple major American professional sports leagues, including League 1.
26 GameOn also had contractual and business relationships with multiple major American professional
27 sports teams and organizations within these major American professional sports leagues as well as with
28 other teams, companies, entities, and organizations in the sports and entertainment industry. Some of

1 these contracts, including GameOn's contracts with League 1, were formally between GameOn and a
 2 firm that controlled, or was controlled by, the sports league, association, or team, or that controlled
 3 respective media rights for that league, association, or team. GameOn referred to its relationship as one
 4 with League 1, and this Indictment does the same. GameOn also had contractual and business
 5 relationships with brands in other industries, including a luxury fashion business located in Milan, Italy.

6 23. GameOn's business relationships were not all the same. In some cases, GameOn initially
 7 offered its chatbot as a free pilot without any contract between GameOn and the customer. Some
 8 customers had contracts that provided for the possibility of revenue sharing with GameOn only if certain
 9 conditions were met. Revenue sharing did not actually occur with nearly all GameOn customers. Other
 10 customers had contracts that called for the customers to pay flat fees to GameOn on a periodic basis or
 11 for a set term while the customer used GameOn's chatbot. In most cases, customers paid GameOn fees
 12 of no more than \$3,000 per month or an equivalent rate over a different period. In some cases, GameOn
 13 promised to pay select prominent customers large annual fees, and GameOn had rights to revenue
 14 sharing with these customers only if certain conditions were satisfied. For example, GameOn paid
 15 League 1 hundreds of thousands of dollars and received no payments and no revenue sharing from
 16 League 1 in return.

17 24. As a result of this business model, GameOn had limited revenues from sales and any
 18 other sources. GameOn's revenues did not exceed \$1,000,000 in any of the years from its founding in
 19 2014 to the present. In most years, GameOn's annual revenue was materially less than \$500,000.

20 25. From in or about 2014 through in or about 2024, GameOn used independent contractors
 21 from Company 1 to work on GameOn financial matters. In or about October 2023, CFO 1 joined
 22 GameOn as a part-time or fractional chief financial officer to assist GameOn with its financial
 23 management. BECKMAN did not freely share information with other GameOn officers, employees,
 24 and contractors, including contractors from Company 1 and CFO 1. Instead, BECKMAN regularly
 25 provided false and otherwise incomplete information about GameOn's finances and his own financial
 26 management.

27 26. Given its limited revenues, GameOn funded its operations in part through outside
 28 investment. GameOn raised a total of over \$80 million going back to its founding in 2014, with over

1 \$60 million of that total coming to GameOn from investors between in or about 2020 through in or
 2 about June 2024. These investments were pursuant to a variety of investment vehicles, including
 3 convertible notes, a Series B Preferred Stock offering from in or about September 2021 through in or
 4 about December 2022, and Simple Agreements for Future Equity or SAFEs from in or about May 2023
 5 through in or about June 2024. SAFEs are a type of investment contract that gives investors a right to
 6 later receive stock in a company. GameOn's SAFE included a \$400 million post-money valuation for
 7 GameOn. Investors in GameOn's Series B Preferred Stock offering between in or about September
 8 2021 and in or about December 2022 were issued shares of GameOn stock, and those shares constitute
 9 securities under the provisions of Title 15, United States Code, Section 78j(b) and Title 17, Code of
 10 Federal Regulations, Section 240.10b-5. The Simple Agreements for Future Equity, or SAFEs,
 11 purchased by GameOn investors between in or about May 2023 and in or about June 2024 were
 12 investment contracts and constitute securities under the provisions of Title 15, United States Code,
 13 Section 78j(b) and Title 17, Code of Federal Regulations, Section 240.10b-5.

14 27. In addition to money raised from investors, GameOn regularly engaged in large financial
 15 transactions with individuals, including BECKMAN, LAU, and others known and unknown to the
 16 Grand Jury, that gave GameOn at least temporary access to funds from those individuals. GameOn
 17 missed and was late to pay payroll for its own employees and to pay other bills on multiple occasions,
 18 and money sometimes was transferred to GameOn when the company needed money for expenses like
 19 payroll. At times, money flowed from GameOn back to these individuals after new funds from GameOn
 20 investors arrived. Personal credit cards were also used at times to cover GameOn expenses, and then
 21 those credit card balances were paid, including portions of the balances that involved personal expenses
 22 unrelated to GameOn, using GameOn investor funds after they arrived. The following examples
 23 demonstrate the pattern of money movement:

24 a. On or about May 4, 2021, a bank account controlled by LAU used the Fedwire
 25 system to transfer \$86,250 to GameOn's corporate bank account with Financial
 26 Institution 3, which had a negative balance before this transfer from LAU. On or
 27 about May 21, 2021, Investor 1 used Fedwire to send approximately \$2.5 million to
 28 GameOn's account with Financial Institution 3 pursuant to an investment deal in

1 which LAU served as GameOn's outside counsel while she was an attorney at Law
2 Firm 2. On or about May 24, 2021, BECKMAN signed a check from GameOn's
3 account with Financial Institution 3 payable to LAU in the amount of \$111,250 with
4 the memo line on the check stating "Reimbursement." On or about May 25, 2021, the
5 \$111,250 check was deposited in a bank account controlled by LAU.

6 b. On or about September 13, 2021, a bank account controlled by LAU used the Fedwire
7 system to transfer \$155,000 to GameOn's corporate bank account with Financial
8 Institution 3, which had a negative balance before this transfer from LAU. On or
9 about September 14, 2021, GameOn's account with Financial Institution 3 received
10 over \$5 million from an investor based in Asia. On or about September 16, 2021,
11 BECKMAN signed a check for \$185,000 payable to LAU from GameOn's account
12 with Financial Institution 3 with the memo line on the check stating "Repayment."
13 On or about September 16, 2021, the \$185,000 check was deposited in a bank
14 account controlled by LAU.

15 c. In or about March 2024, one of LAU's personal credit cards incurred expenses
16 relating to GameOn. In or about May 2024, new investor funds went to GameOn's
17 account with Financial Institution 1. In or about May 2024, after knowingly causing
18 money to be transferred between GameOn accounts, BECKMAN knowingly caused
19 approximately \$270,000 of GameOn investor money to pay one of LAU's
20 outstanding credit card bills, which included GameOn expenses but also personal
21 expenses unrelated to GameOn's business.

22 28. From at least in or about September 2018 through his resignation from GameOn in or
23 about July 2024, BECKMAN served as the primary point of contact for new and existing GameOn
24 investors and its board of directors, and BECKMAN controlled and understood the financial information
25 for GameOn that he shared with investors. BECKMAN and others had signatory authority over
26 GameOn's accounts with Financial Institution 1, Financial Institution 3, and Financial Institution 4.
27 LAU assisted BECKMAN by, among other things, sharing financial information, populating and
28 providing access to GameOn's online data room containing investment materials, answering investor

1 questions, sharing wire instructions, and finalizing investment contracts between GameOn and investors.
 2 LAU also assisted BECKMAN by creating and modifying financial spreadsheets to share with investors
 3 and in causing fake documents to be created. LAU was often the only person associated with GameOn
 4 other than BECKMAN communicating with and copied on communications with GameOn investors
 5 prior to their investments.

6 Defendants' Scheme to Defraud Investors

7 29. Beginning on a date unknown, but no later than in or about September 2018, and
 8 continuing through in or about July 2024, BECKMAN knowingly devised, intended to devise,
 9 participated in, and engaged in a scheme, plan, and artifice to defraud GameOn investors as to a material
 10 matter, and to obtain money and property by means of materially false and fraudulent pretenses,
 11 representations, and promises, and by omission and concealment of material facts with a duty to
 12 disclose.

13 30. Beginning on a date unknown, but no later than in or about April 2022 and continuing
 14 through in or about July 2024, LAU knowingly joined in a conspiracy with BECKMAN to defraud
 15 GameOn investors and also knowingly devised, intended to devise, participated in, and engaged in a
 16 scheme, plan, and artifice to defraud GameOn investors as to a material matter, and to obtain money and
 17 property by means of materially false and fraudulent pretenses, representations, and promises, and by
 18 omission and concealment of material facts with a duty to disclose.

19 31. BECKMAN and LAU knowingly and intentionally made and caused to be made
 20 materially false, fraudulent, and misleading statements to GameOn investors about, among other things,
 21 GameOn's revenues, sales, profits, cash balances, customers, use of investor funds, and other aspects of
 22 GameOn's business to induce investment in GameOn.

23 32. When pushed for additional support for their fraudulent claims, BECKMAN and LAU
 24 knowingly and intentionally made and caused to be made materially false, fraudulent, and misleading
 25 statements and representations through false and fraudulent documents, false and fraudulent email
 26 addresses using the names of real people, and false and fraudulent email correspondence.

27 33. As part of the scheme to defraud, BECKMAN and LAU knowingly and intentionally
 28 made materially false, fraudulent, and misleading statements to investors and failed to disclose material

1 facts, using the following means and methods, among others: (1) materially false and misleading written
2 and verbal communications, including in emails and investment materials available in an online data
3 room; (2) materially false and misleading financial statements, models, and other information; (3)
4 materially false and misleading statements and representations in investment contracts, notes, and
5 agreements; (4) the impersonation of real individuals and use of false and fraudulent email addresses
6 and communications to create and distribute materially false and fraudulent GameOn financial and
7 business information; (5) materially false and misleading audit reports, board meeting minutes, bank and
8 investment account statements, invoices, diligence memos, and other documents; (6) communications
9 and processes that siloed information at GameOn and provided materially false and misleading
10 information to GameOn directors, officers, employees, contractors, and customers; and (7) the use of
11 significant amounts of GameOn and investor funds for BECKMAN and LAU's personal benefit without
12 disclosing that use to GameOn's investors, shareholders, and board of directors with a duty to disclose.

13 34. To perpetuate the scheme, BECKMAN and LAU knowingly and intentionally distributed
14 and caused to be distributed financial and business information about GameOn that they knew to be
15 materially false and fraudulent to new potential investors and also to certain investors and investors'
16 representatives serving on GameOn's board of directors, investors and investor representatives
17 observing GameOn's board of director meetings, and other individuals attending GameOn's board
18 meetings. The materially false and fraudulent statements and representations to potential and existing
19 investors were designed and intended to induce new investment into GameOn. The materially false and
20 fraudulent statements and representations to existing investors were also designed and intended to lull
21 existing investors, including Investor 1, Investor 2, Investor 3, Investor 4, Investor 5, Investor 6, and
22 others known and unknown to the Grand Jury, into a false sense of security and to postpone any
23 investigation into BECKMAN and LAU's scheme to defraud. These continued lies allowed
24 BECKMAN and LAU to continue to raise money for GameOn through their scheme to defraud from
25 other existing and new investors. BECKMAN and LAU also designed and perpetrated their scheme
26 understanding that certain major existing investors were a source of additional potential investment in
27 future fundraising rounds that they would go back to later to ask for additional investments. In fact,
28 existing investors that received periodic financial updates after their initial investments often

1 participated in subsequent GameOn fundraising rounds, including Investor 1, Investor 2, Investor 4,
 2 Investor 5, Investor 6, and other investors known and unknown to the Grand Jury.

3 35. As further described in this Indictment, after receiving materially false, fraudulent, and
 4 misleading statements and representations from BECKMAN and LAU regarding GameOn's business,
 5 Investor 1, Investor 2, Investor 3, Investor 4, Investor 5, and other GameOn investors known and
 6 unknown to the Grand Jury gave money to GameOn using electronic wire transfers that traveled
 7 between one state and another state. Specific wire transfers are described in paragraph 102 and
 8 incorporated here by reference. BECKMAN and LAU also knowingly transmitted and caused to be
 9 transmitted email and other electronic communications with GameOn investors and their representatives
 10 that originated from individuals in the Northern District of California and traveled through servers
 11 outside California and in foreign countries and were received by individuals outside California and in
 12 other countries.

13 36. Parts of BECKMAN and LAU's scheme to defraud and examples are described below.

14 A. Materially False, Fraudulent, and Misleading Statements and Representations About
GameOn's Revenue, Cash, Customers, and Other Financial Matters

16 37. As part of the scheme, BECKMAN and LAU knowingly and intentionally made and
 17 caused to be made materially false, fraudulent, and misleading statements and representations to
 18 investors regarding GameOn's historical financial performance and its projected future performance.

19 38. Beginning on a date unknown but no later than September 2018 and continuing through
 20 in or about June 2024, BECKMAN knowingly and intentionally created and caused the creation of
 21 materially false and fraudulent unaudited financial statements for GameOn. These unaudited financial
 22 statements purported to show GameOn's profit and loss statements with, among other things, GameOn
 23 revenues (including revenues from sales and any other sources), profits, and net income on quarterly
 24 bases. These financial statements also included GameOn's balance sheets which purported to show,
 25 among other things, GameOn's balances of cash and cash equivalents and accounts receivable as of
 26 specific dates in time. BECKMAN knew that these unaudited financial statements materially inflated
 27 and changed important financial information to make GameOn appear more successful than it actually
 28 was and more attractive to investors. LAU assisted BECKMAN with creating and manipulating these

1 financial statements going back at least to October 2019.

2 39. During the scheme, BECKMAN and LAU distributed these materially false and
 3 fraudulent unaudited GameOn financial statements directly to potential and existing investors via email
 4 and made them available to investors through GameOn's online data room knowing the financial
 5 statements were materially false, fraudulent, and misleading and intending to defraud GameOn
 6 investors.

7 40. GameOn investors were led to believe that these financial statements were accurate and
 8 reliable. For example, the Series B Preferred Stock Purchase Agreement, signed by BECKMAN on
 9 behalf of GameOn, and also by representatives of Investor 1, Investor 2, Investor 4, and Investor 6, and
 10 by Investor 5 and others as purchasers under the agreement, contained false and misleading
 11 representations regarding GameOn's business, financial condition, financial statements, and liabilities.
 12 Among other things, the Series B Preferred Stock Purchase Agreement represented that GameOn's
 13 unaudited financial statements as of June 30, 2021, and for the fiscal year ending December 31, 2020
 14 "fairly present in all material respects the financial condition and operating results of the Company . . .
 15 subject in the case of the unaudited Financial Statements to normal year-end audit adjustments."

16 41. The following are examples in which BECKMAN and LAU knowingly and intentionally
 17 sent and caused to be sent materially false, fraudulent, and misleading unaudited financial statements at
 18 a time when an investor was considering investing in GameOn:

19 a. On or about February 24, 2020, BECKMAN emailed an Investor 4 representative and
 20 attached a spreadsheet containing materially false and fraudulent unaudited financial
 21 statements for GameOn through December 2019 and a materially false and fraudulent
 22 balance sheet for GameOn through September 2019. According to the spreadsheet's
 23 metadata, LAU is the author of the spreadsheet, and it was created on or about
 24 October 14, 2019. BECKMAN knew this spreadsheet contained materially false and
 25 fraudulent representations regarding GameOn's cash balances, revenue (including
 26 sales), and other measurements of financial performance and financial health. At the
 27 time of this February 24, 2020 email exchange with BECKMAN, Investor 4 was
 28 considering investing in GameOn and did so through an entity formed for the purpose

1 of investing in GameOn securities in or about June 2020 pursuant to a convertible
2 promissory note in the amount of \$500,000. Following this initial investment,
3 Investor 4 continued to receive false and fraudulent information about GameOn and
4 made subsequent investments of \$500,000 in or about January 2021 and \$1,000,000
5 in or about October 2022.

6 b. On or about May 18, 2021, two weeks after sending GameOn \$86,250 from her
7 personal bank account as set forth in paragraph 27.a, LAU sent an email to Investor 1's
8 Chief Financial Officer copying into the body of the email "April financials" that she
9 claimed she had pulled herself. LAU sent this email from her email account with
10 Law Firm 2, where she worked at the time, and represented GameOn as outside
11 counsel in the negotiations with Investor 1. LAU's email included a table with
12 materially false and fraudulent financial information for GameOn from April 2021,
13 including over \$4 million in total sales and approximately \$1.9 million in gross profit.
14 In reality, GameOn's revenues figures (including sales) did not exceed \$1 million in
15 all of 2021. Investor 1 was at the time considering investing in GameOn pursuant to
16 a convertible promissory note and did send GameOn approximately \$2.5 million from
17 several funds managed by Investor 1 three days later on May 21, 2021.

18 c. On or about May 19, 2021, BECKMAN provided Investor 1's CFO another version
19 of the unaudited quarterly financial statement that contained materially false and
20 fraudulent revenue, cash, and other financial information. In addition to false
21 information about revenue and profits like the information that LAU sent to Investor
22 1 on or about May 18, 2021, BECKMAN's financial spreadsheet stated that as of
23 May 15, 2021, GameOn's account with Financial Institution 3 had a balance of
24 approximately \$5.96 million and that GameOn had approximately \$2.89 million in
25 funds with Financial Institution 1. In reality, BECKMAN knew these balances were
26 materially inflated. In fact, GameOn's account with Financial Institution 3 had a
27 negative balance as of May 15, 2021, and its account with Financial Institution 1 had
28 less than approximately \$2,350 as of May 15, 2021.

- d. On or about September 21, 2021, LAU, using her email address at Law Firm 2, sent Investor 1's Chief Financial Officer a copy of GameOn's unaudited quarterly financial statement updated through June 2021. At the time, Investor 1 was considering investing in GameOn's Series B Preferred Stock Offering, and LAU, while an attorney at Law Firm 2, represented GameOn in those negotiations with Investor 1. Among other false and fraudulent statements, this spreadsheet described over \$6 million in total sales for GameOn's second quarter in 2021 and over \$4 million in gross profits for this same period. The balance sheet also materially overstated GameOn's balances of cash and cash equivalents and accounts receivable. After receiving this and other false and fraudulent information about GameOn from BECKMAN and LAU, in or about November 2021, Investor 1 made additional investments in GameOn pursuant to the Series B Preferred Stock Offering from three funds that Investor 1 managed in the total amount of approximately \$3.2 million.
- e. On or about November 23, 2021, BECKMAN sent an email to Investor 2 partners, copying LAU, and attaching GameOn's unaudited financial statement through the third quarter of 2021 as well as other false and fraudulent financial and customer documents. At the time, Investor 2 was considering investing in GameOn's Series B Preferred Stock Offering. For example, among other false and fraudulent information in this version of the quarterly financial statements, the balance sheet represented that GameOn had approximately \$17.8 million as of September 30, 2021, in a specific account with Financial Institution 3. BECKMAN knew that representation and others in this financial statement, including statements regarding revenue and profits, were materially false. In fact, GameOn had approximately \$340,000 in that specific Financial Institution 3 account and approximately \$5.1 million in another account with Financial Institution 3 as of September 30, 2021. The balance sheet also represented that GameOn had approximately \$3.9 million in funds with Financial Institution 1, which BECKMAN knew to be materially false. In reality, GameOn had approximately \$2,350 in its Financial Institution 1 account as of September 30, 2021.

1 After receiving this and other false and fraudulent information about GameOn, in or
2 about January 2022, Investor 2 invested \$2.25 million in GameOn pursuant to the
3 Series B Preferred Stock Offering.

4 f. On or about June 8, 2023, BECKMAN emailed an Investor 3 partner a copy of
5 GameOn's unaudited financial statements through the first quarter of 2023. LAU was
6 the only other person copied on this email. As with other instances in which
7 BECKMAN and LAU sent unaudited financial statements to potential and existing
8 investors, this version contained materially false and fraudulent financial information
9 relating to GameOn. Among other things, this version of the financial statement
10 falsely stated that GameOn had approximately \$68.6 million in total sales for all of
11 2022, approximately \$54.1 million in gross profit for all of 2022, approximately
12 \$25.7 million in funds with Financial Institution 1 as of March 31, 2023, and
13 approximately \$24.3 million in accounts receivable as of March 31, 2023. As noted
14 above, BECKMAN knew that GameOn did not have revenue, let alone gross profits,
15 over \$1 million in any year since its founding, knew GameOn had materially less in
16 accounts receivable, and also knew that its Financial Institution 1 account did not
17 have anywhere close to \$25 million in it. In truth, as of March 31, 2023, GameOn's
18 Financial Institution 1 account had a balance of approximately \$590,000. After
19 receiving this and other false and fraudulent information about GameOn, in or about
20 July 2023, Investor 3 used two funds that it managed to invest approximately \$3
21 million in GameOn pursuant to the SAFE Offering.

22 g. On or about November 1, 2023, BECKMAN emailed partners from Investor 2 who
23 were considering an additional investment in GameOn's SAFE Offering.
24 BECKMAN's email attached a version of GameOn's quarterly financials, which
25 stated that GameOn had approximately \$72.4 million in total sales for January
26 through September 2023. The spreadsheet also stated GameOn had approximately
27 \$56.8 million in gross profits for this same period. BECKMAN knew these figures
28 were materially overstated, with neither GameOn's actual revenue (including sales)

nor its gross profits exceeding \$1 million for all of 2023. BECKMAN also knew the balance sheet was materially false, fraudulent, and misleading by claiming that GameOn's account balance with Financial Institution 4 was approximately \$14.1 million and its balance with Financial Institution 1 was approximately \$24.9 million as of September 30, 2023. In reality, as of September 30, 2023, GameOn's account balance with Financial Institution 4 was approximately \$5.3 million, and GameOn's balance with Financial Institution 1 was \$0. Investor 2 invested \$100,000 in or about January 2024 pursuant to GameOn's SAFE Offering.

9 42. BECKMAN and LAU's scheme involved other verbal and written statements in which
10 BECKMAN and LAU knowingly and intentionally gave GameOn investors materially false, fraudulent,
11 and misleading information about GameOn's financial performance and projections, including knowing
12 and intentional materially false, fraudulent, and misleading statements and representations to new and
13 existing investors about how GameOn made its money and misleading statements about revenue
14 sharing.

15 43. The scheme involved BECKMAN and LAU knowingly and intentionally making
16 materially false, fraudulent, and misleading statements and representations to investors, both express and
17 implied, that GameOn was presently a financially strong and stable company, with large growing
18 revenues, projected growth, significant reserves of cash and cash equivalents, and an extended runway
19 to continue operations. In truth, BECKMAN and LAU knew that GameOn depended on new investor
20 funds to operate, burned through its funds, received overdraft notices from banks, was delinquent in
21 paying certain customers, and often was on the brink of not having enough money in the bank to operate
22 and make payroll. BECKMAN and LAU knew that GameOn was late to pay payroll on multiple
23 occasions and used individual bank accounts and credit cards to pay their employees.

24 44. In addition, BECKMAN knowingly and intentionally made and caused to be made
25 materially false, fraudulent, and misleading statements and representations about GameOn's business
26 relationships and customers to GameOn investors. In some instances, BECKMAN made statements and
27 representations to GameOn investors characterizing certain entities as GameOn customers when
28 BECKMAN knew those entities were never GameOn customers at all. In other instances, BECKMAN

1 made statements and provided documents to investors that exaggerated GameOn's customer
 2 relationships by describing specific revenue and payments from customers to GameOn that did not
 3 actually exist. BECKMAN further misled GameOn investors by describing certain customer
 4 relationships as producing revenue for GameOn when in fact BECKMAN knew that GameOn owed
 5 those customers money and was regularly late in paying them.

6 45. For example, in or about June 2023, BECKMAN emailed an Investor 3 partner and
 7 attached a breakdown of GameOn revenue by customer that included significantly overstated revenue
 8 figures for particular GameOn customers. The breakdown document also included companies like
 9 Beverage Company 1 that BECKMAN knew was not a GameOn customer responsible for any GameOn
 10 revenue. Later that month, the Investor 3 partner asked BECKMAN questions about specific customers
 11 and specific revenue from those customers. In response, BECKMAN provided false and fraudulent
 12 information about GameOn's relationship with League 1 and others. When the Investor 3 partner asked
 13 BECKMAN to send a redacted bank statement supporting BECKMAN's claims regarding GameOn's
 14 revenue from League 1 as reflected in the aforementioned breakdown document, BECKMAN emailed
 15 the Investor 3 partner, copying LAU and other Investor 3 representatives, and attached a fake Financial
 16 Institution 3 statement for GameOn's account there. The fake bank statement that BECKMAN sent
 17 included a wire transfer of \$3.28 million from an entity associated with League 1, but in truth,
 18 BECKMAN knew that bank statement was materially false, fraudulent, and misleading and that the
 19 \$3.28 million transaction relating to League 1 never happened.

20 B. Materially False and Fraudulent Statements, Representations, and Promises About How
 21 Investors' Money Would Be Used

22 46. It was part of the scheme that BECKMAN and LAU knowingly and intentionally made
 23 and caused to be made materially false and fraudulent statements, representations, and promises
 24 regarding how GameOn, BECKMAN, and LAU would use investor funds.

25 47. GameOn investors understood that their investments would go to GameOn's business,
 26 not personal expenses associated with BECKMAN, LAU, and others, but BECKMAN and LAU
 27 knowingly and intentionally diverted fraudulently obtained investor funds for their own use and benefit
 28 throughout the scheme to defraud.

1 48. BECKMAN also affirmatively told some investors that GameOn would use new
 2 investment for specific purposes associated with growing GameOn's team, expanding into new business
 3 verticals beyond sports, and making acquisitions.

4 49. Despite these statements, representations, and promises, BECKMAN and LAU regularly
 5 used investor funds for personal expenses. Among other things, BECKMAN and LAU used GameOn
 6 funds from investors to pay hundreds of thousands of dollars to BECKMAN's minor children's school,
 7 hundreds of thousands of dollars to a social club where BECKMAN and LAU hosted their wedding in
 8 or about November 2023, hundreds of thousands of dollars in payments to jewelry and luxury retail
 9 businesses, hundreds of thousands of dollars on luxury vehicles, and over \$100,000 in personal property
 10 taxes. BECKMAN and LAU also used new investor funds to pay personal credit card balances that
 11 were used in part to pay for GameOn expenses and in part to pay for BECKMAN and LAU's personal
 12 expenses.

13 50. In addition, BECKMAN and LAU knowingly and intentionally used GameOn investor
 14 funds to purchase San Francisco residences on [REDACTED] Street and [REDACTED] Street. The full addresses of the
 15 [REDACTED] Street residences are listed in the forfeiture allegation of this Indictment and are incorporated by
 16 reference here. In or about December 2020, BECKMAN and LAU used approximately \$360,000 in
 17 GameOn investor funds to put toward the purchase of the [REDACTED] Street residence. In or about April 2022,
 18 BECKMAN and LAU used approximately \$4.2 million in investor funds to purchase the [REDACTED] Street
 19 residences. As part of their purchase of the [REDACTED] Street residences, BECKMAN and LAU knowingly
 20 caused wire transfers from GameOn's account with Financial Institution 4 to BECKMAN and LAU's
 21 joint personal bank account at Financial Institution 4 in the amount of \$4,100,000 and \$100,000, both
 22 occurring on or about April 18, 2022. Before transferring this money from GameOn's corporate
 23 account, BECKMAN and LAU's joint personal account with Financial Institution 4 had a balance of
 24 approximately \$35,000. On or about April 18, 2022, BECKMAN and LAU caused a wire transfer of
 25 \$127,500 from their joint personal account at Financial Institution 4 to the title company for the
 26 purchase of the [REDACTED] Street residences, and on or about April 26, 2022, BECKMAN and LAU
 27 knowingly caused a wire transfer of \$4,131,009.09 from their joint personal account at Financial
 28 Institution 4, knowing that the money was proceeds of the scheme to defraud GameOn investors, for the

1 remainder of the purchase of the [REDACTED] Street residences.

2 C. Impersonation of Real People Affiliated with GameOn to Share False and Fraudulent
 3 Information Regarding GameOn's Finances and Business

4 51. As part of the scheme, BECKMAN knowingly and intentionally used names and initials
 5 of real people affiliated with GameOn and fake GameOn email accounts in their names without their
 6 permission and without lawful authority to make materially false, fraudulent, and misleading statements
 7 and representations about GameOn business and financial matters to GameOn investors and GameOn's
 8 board of directors.

9 52. For example, in or about October and November 2019, BECKMAN knowingly and
 10 intentionally used the name and initials of Consultant 1, a real person who consulted for GameOn in or
 11 about 2019, and a fake GameOn email account using Consultant 1's name and initials to send materially
 12 false and fraudulent financial information about GameOn to potential GameOn investors in Asia.
 13 BECKMAN also used the fake Consultant 1 email account to vouch for materially false and fraudulent
 14 financial statements for GameOn that BECKMAN knew had been manipulated and altered by
 15 BECKMAN and LAU in or about October 2019.

16 53. In another example from in or about February 2023 and continuing through at least in or
 17 about May 2024, BECKMAN used the name and initials of Contractor 1, a real person working on
 18 GameOn financial matters for Company 1, and fake GameOn email accounts using Contractor 1's name
 19 and initials to send materially false and fraudulent financial information and documents about GameOn
 20 to investors, including representatives of Investor 1, Investor 6, and others serving on GameOn's board
 21 of directors. In total, BECKMAN knowingly used the fake Contractor 1 email account to distribute
 22 multiple false and fraudulent versions of GameOn's unaudited financial statements, at least nine false
 23 and fraudulent bank statements, and one false and fraudulent audit report. BECKMAN knew that the
 24 false and fraudulent bank statements distributed through the fake Contractor 1 email account
 25 misrepresented specific transactions between GameOn and its customers and other third parties to make
 26 GameOn's revenue streams appear more significant than they were. False and fraudulent bank
 27 statements also misrepresented the cash available in GameOn's accounts. In July 2023, BECKMAN
 28 sent a series of bank statements that he knew to be materially false and fraudulent to LAU before

1 causing those bank statements to be sent from the fake Contractor 1 email accounts back to BECKMAN,
 2 which BECKMAN then forwarded to representatives of Investor 6 along with false and fraudulent
 3 correspondence impersonating Contractor 1. BECKMAN's objective was to give false and fraudulent
 4 financial information about GameOn the appearance of coming from a person who approved and
 5 validated the financial information other than BECKMAN.

6 54. In a third example occurring between on or about October 23, 2023, and continuing
 7 through in or about April 2024, BECKMAN used the name and initials of CFO 1, a real person who
 8 served during that time as GameOn's part-time or fractional CFO, and an email address using CFO 1's
 9 name and initials to distribute materially false and fraudulent financial information to Investor 1 and an
 10 Investor 1 partner serving on GameOn's board of directors. Around this time, BECKMAN and LAU
 11 were working to raise new money for GameOn through its SAFE Offering. On or about November 9,
 12 2023, BECKMAN knowingly and intentionally caused the fake CFO 1 email account to send Investor 1
 13 GameOn's unaudited quarterly financial report, knowing it contained false and fraudulent information
 14 relating to GameOn's finances, forecasts, and business. BECKMAN deleted the fake CFO 1 email
 15 account in or about April 2024.

16 55. BECKMAN created additional fake emails and email correspondence in and using the
 17 names of real people throughout the scheme without their knowledge and without lawful authority.

18 D. Creating and Distributing Materially False, Fraudulent, and Misleading Audit Reports
 19 Supporting GameOn Financial Information

20 56. As part of the scheme, BECKMAN and LAU knowingly and intentionally created and
 21 distributed, and caused the creation and distribution of, materially false, fraudulent, and misleading audit
 22 reports and other false, fraudulent, and misleading statements and representations about auditors who
 23 purported to support, validate, and certify GameOn's financial information and statements. As further
 24 described below, in some instances, BECKMAN and LAU sent these audit reports and statements and
 25 representations regarding auditors to GameOn's board of directors, board observers, and investors in
 26 furtherance of the scheme to defraud.

27 57. On or about June 20, 2022, LAU, who was an attorney working for Venture Capital Firm
 28 1 at the time, sent BECKMAN a copy of a genuine audited financial statement for a company with no

1 connection to GameOn that was in fact prepared by Professional Services Company 1 (“Genuine
2 Professional Services Company 1 Audit Report”). The Genuine Professional Services Company 1 Audit
3 Report that LAU sent to BECKMAN included a watermark bearing an email address associated with
4 Venture Capital Firm 1. LAU had access to the Genuine Professional Services Company 1 Audit Report
5 through her work at Venture Capital Firm 1.

6 58. On or about June 21, 2022, BECKMAN sent a fake audit report purporting to be written
7 by Professional Services Company 1 for GameOn’s 2021 financial statements to GameOn’s board of
8 directors and board observers, including representatives of Investor 1, Investor 4, and Investor 6 (the
9 “Fake Professional Services Company 1 Audit Report”). BECKMAN knew that Professional Services
10 Company 1 did not author the Fake Professional Services Company 1 Audit Report, and BECKMAN
11 knew that Professional Services Company 1 did not perform any audit services for GameOn. The Fake
12 Professional Services Company 1 Audit Report was similar in style, form, structure, and substance to the
13 Genuine Professional Services Company 1 Audit Report that LAU sent to BECKMAN the day before.
14 The Fake Professional Services Company 1 Audit Report included Professional Services Company 1’s
15 name, logo, and signature and falsely claimed to be an audit performed by Professional Services
16 Company 1 of GameOn’s 2021 financial statements with an unqualified opinion regarding those
17 financial statements. The GameOn financial figures contained in the Fake Professional Services
18 Company 1 Audit Report were also materially false, fraudulent, and misleading. Among other things,
19 BECKMAN knew that the Fake Professional Services Company 1 Audit Report materially overstated
20 GameOn’s revenue and sales figures, bank account balances, accounts receivable, and gross profits.

21 59. Beginning in or about July 2023, BECKMAN and LAU knowingly and intentionally
22 made materially false and fraudulent statements and representations to, and knowingly and intentionally
23 shared materially false and fraudulent information with, GameOn’s board of directors and board
24 observers, including representatives of Investor 1, Investor 4, and Investor 6, regarding GameOn’s work
25 with Professional Services Company 2, a Big Four accounting firm. On or about July 27, 2023, LAU
26 sent BECKMAN a genuine audit report for another company’s financial statements performed by
27 Professional Services Company 2, which LAU had access to because her employer, Venture Capital
28 Firm 1, had considered investing in the company that was the subject of the genuine audit report (the

1 “Genuine Professional Services Company 2 Audit Report”). On or about July 28, 2023, BECKMAN
 2 lied to GameOn’s board of directors and board observers in email correspondence by telling them, “We
 3 have started the process of auditing our 2022 financials. We used [Professional Services Company 1]
 4 for 2021 and are using [Professional Services Company 2] for last year.” LAU knowingly and
 5 intentionally assisted BECKMAN in drafting this false and fraudulent email. Later, at a July 2023 board
 6 meeting, BECKMAN knowingly and intentionally repeated false information relating to audits of
 7 GameOn’s financial statements by telling the GameOn board and its observers that GameOn was using
 8 Professional Services Company 2 to audit its 2022 financial statements. In fact, BECKMAN and LAU
 9 knew that Professional Services Company 2 was not performing any audit services for GameOn at this
 10 time.

11 60. Beginning in or about September 2023 and continuing through in or about November
 12 2023, LAU met and corresponded with Professional Services Company 2 representatives regarding the
 13 possibility of Professional Services Company 2 performing audit services for GameOn. LAU arranged
 14 for a meeting in or about early October 2023 that was attended by BECKMAN, LAU, a Professional
 15 Services Company 2 audit partner, and another Professional Services Company 2 employee.
 16 BECKMAN and LAU knew that Professional Services Company 2 never agreed to perform audit
 17 services for GameOn during their correspondence and meetings.

18 61. Rather than actually engage and pay Professional Services Company 2 to audit GameOn,
 19 BECKMAN created a fake audit report using Professional Services Company 2’s name. On or about
 20 October 19, 2023, BECKMAN sent LAU via email an audit report for GameOn’s 2022 financial
 21 statements purportedly authored by Professional Services Company 2. BECKMAN created this fake
 22 audit report by modifying the Genuine Professional Services Company 2 Audit Report that LAU had
 23 sent BECKMAN by email on or about July 27, 2023, as described in paragraph 59. On or about October
 24 23, 2023, BECKMAN sent LAU an email with the subject line “attached please take look,” attaching a
 25 revised version of the audit report for GameOn’s 2022 financial statements purportedly authored by
 26 Professional Services Company 2 along with other GameOn board materials containing false and
 27 fraudulent information (the “Fake Professional Services Company 2 Audit Report”). At the time of the
 28 emails described in this paragraph, BECKMAN and LAU knew that Professional Services Company 2

1 had not actually authored the Fake Professional Services Company 2 Audit Report, and BECKMAN and
 2 LAU also knew that Professional Services Company 2 had not begun performing audit services for
 3 GameOn. The Fake Professional Services Company 2 Audit Report included Professional Services
 4 Company 2's name, logo, and signature, and it was similar in style, form, structure, and substance to the
 5 Genuine Professional Services Company 2 Audit Report. The Fake Professional Services Company 2
 6 Audit Report materially overstated key financial figures for GameOn as of December 31, 2022,
 7 including, for example, GameOn's gross sales and revenues, income, balances of cash and cash
 8 equivalents, and accounts receivable, and provided an unqualified opinion supporting those figures. The
 9 Fake Professional Services Company 2 Audit Report stated that GameOn's Gross Sales for the Year
 10 Ended December 31, 2022, were approximately \$68.6 million, when in reality, BECKMAN and LAU
 11 knew that GameOn's gross sales or revenue for this period was less than \$1,000,000.

12 62. Later that morning, on or about October 23, 2023, and before BECKMAN distributed the
 13 Fake Professional Services Company 2 Audit Report to anyone else, BECKMAN emailed LAU again,
 14 this time attaching the Genuine Professional Services Company 2 Audit Report that LAU had sent him
 15 originally on or about July 27, 2023.

16 63. Later in the morning, on or about October 23, 2023, after the exchanges with LAU
 17 described in paragraphs 61 and 62, BECKMAN emailed the Fake Professional Services Company 2
 18 Audit Report to GameOn's board of directors and board observers, including representatives of Investor
 19 1, Investor 4, Investor 6, and other investors and investor representatives, including a representative of at
 20 least one investor that invested approximately \$3.1 million in or about May 2024 after receiving the
 21 Fake Professional Services Company 2 Audit Report. BECKMAN also included Board Secretary 2 on
 22 the email correspondence with GameOn's board and blind copied LAU and his own personal email on
 23 the correspondence. This email originated from, and was received by individuals in, the Northern
 24 District of California and also was received by individuals outside California.

25 64. Later, in or about January and February 2024, BECKMAN acknowledged to at least one
 26 GameOn consultant that the Fake Professional Services Company 2 Audit Report did not contain
 27 accurate financial information. BECKMAN attempted to shift blame to others for the inaccuracies.

28 65. Beginning on a date unknown but no later than in or about March 2024 and continuing

1 through at least in or about May 2024, BECKMAN and LAU distributed the Fake Professional Services
 2 Company 1 Audit Report and the Fake Professional Services Company 2 Audit Report to potential and
 3 existing GameOn investors and their representatives intending to induce their investment in GameOn's
 4 SAFE Offering and to give existing investors a false sense of security regarding GameOn's business and
 5 financial health. For example, on or about March 19, 2024, a wealth advisor for Investor 5 emailed
 6 LAU asking for a copy of GameOn's audited financial statements. At the time, Investor 5 expressed an
 7 interest in investing in GameOn's SAFE Offering out of a retirement account, and Investor 5's wealth
 8 advisor had indicated that audited financial statements would be necessary to hold the SAFE in the
 9 retirement account. Later that evening, LAU sent the wealth advisor via email a copy of the Fake
 10 Professional Services Company 2 Audit Report intending for the wealth advisor to rely on it despite
 11 LAU knowing it contained materially false and fraudulent information and knowing that Professional
 12 Services Company 2 did not author the report. Unbeknownst to LAU, the wealth advisor did not rely on
 13 the Fake Professional Services Company 2 Audit Report because Investor 5 decided not to invest from
 14 the retirement account. LAU's email to Investor 5's wealth advisor originated in the Northern District
 15 of California and was received Investor 5's wealth advisor outside California.

16 66. On or about May 30, 2024, BECKMAN wrote to the Professional Services Company 2
 17 audit partner that he and LAU met with back in October 2023, asking for "an update from you on what
 18 we got done in our last back and forth and where we had planned to head next."

19 67. During this part of the scheme, BECKMAN received questions about the Fake
 20 Professional Services Company 2 Audit Report from GameOn's board of directors, officers, and
 21 advisors, including from CFO 1 and Board Secretary 2. BECKMAN falsely blamed Company 1,
 22 GameOn's outside financial contractors, for the creation of the Fake Professional Services Company 2
 23 Audit Report even though BECKMAN knew neither Company 1 nor any of its contractors was
 24 responsible for the Fake Professional Services Company 2 Audit Report.

25 E. Creating, Sending and Delivering Materially False and Fraudulent Statements Regarding
 26 GameOn's Account with Financial Institution 1, Including Use of Fake Emails and Fake
Account Statements

27 a. Creating and Sending Fake Emails

28 68. As part of the scheme, BECKMAN and LAU knowingly and intentionally made and

1 caused to be made materially false, fraudulent, and misleading statements and representations regarding
 2 GameOn's account with Financial Institution 1 to GameOn's board of directors, investors, officers, and
 3 contractors. To deflect questions and pressure from GameOn's officers while BECKMAN and LAU
 4 continued to raise new money through GameOn's SAFE Offering based on false and fraudulent
 5 pretenses, BECKMAN created email addresses in the names of real people who were employees of
 6 Financial Institution 1, including Financial Advisor 1 and Financial Advisor 2, and knowingly and
 7 intentionally caused materially false and fraudulent account statements and information to go to
 8 GameOn's CFO 1 and Board Secretary 2 using these fake email accounts. In doing so, BECKMAN
 9 intended to make false and fraudulent statements and representations to CFO 1, Board Secretary 2, and
 10 the investors represented on GameOn's board of directors and observing GameOn's board of directors.
 11 BECKMAN knew that Board Secretary 2 had performed the role of GameOn board secretary and
 12 therefore understood that information conveyed to Board Secretary 2 would be conveyed to GameOn's
 13 board of directors and board observers.

14 69. On or about April 10, 2024, BECKMAN created a fake email account using the name of
 15 Financial Advisor 1 and began an email chain with that fake account, BECKMAN, CFO 1, and Board
 16 Secretary 2. At the time, CFO 1 and Board Secretary 2 were seeking to use money that BECKMAN had
 17 falsely led them to believe existed in GameOn's Financial Institution 1 account and that GameOn
 18 needed to meet its business expenses. BECKMAN paid for the fake Financial Advisor 1 email account
 19 and domain using BECKMAN's personal credit card. BECKMAN used this fake email account to send
 20 false and misleading explanations to CFO 1 and Board Secretary 2 relating to Financial Advisor 1,
 21 GameOn's balance and holdings at Financial Institution 1, activity in GameOn's account, and other false
 22 and fraudulent information.

23 70. On or about April 17, 2024, BECKMAN created three additional fake email addresses in
 24 the names of real individuals working for Financial Institution 1. BECKMAN paid for the fake email
 25 addresses and associated domain using his personal credit card. BECKMAN tried to make these later-
 26 created accounts and their domain appear like professional work emails for Financial Advisor 1 and
 27 Financial Advisor 2, another employee of Financial Institution 1. In the following days and weeks,
 28 BECKMAN knowingly and intentionally used these fake email accounts to cause false, fraudulent, and

1 misleading information, documents, and explanations to be sent to CFO 1 and Board Secretary 2, who
 2 were still seeking information about GameOn's account with Financial Institution 1 and access to
 3 GameOn funds that they believed existed. For example, on or about April 17, 2024, BECKMAN told
 4 CFO 1 and Board Secretary 2 that BECKMAN was able to download a statement that had been made
 5 available by the fake email for Financial Advisor 1 and then sent the statement to CFO 1 and Board
 6 Secretary 2 via email. The statement that BECKMAN sent to CFO 1 and Board Secretary 2 showed a
 7 balance for GameOn's account at Financial Institution 1 of approximately \$13.2 million as of March 31,
 8 2024, including several Certificates of Deposit or CDs, even though BECKMAN knew that GameOn
 9 actually had \$0 in its account with Financial Institution 1 on or about March 31, 2024. BECKMAN also
 10 knowingly and intentionally used the fake email accounts to provide materially false, fraudulent, and
 11 misleading information to CFO 1 and Board Secretary 2 regarding obstacles to GameOn obtaining
 12 money supposedly held by Financial Institution 1, ranging from difficulty breaking Certificates of
 13 Deposit early to an investigation of Financial Advisor 1 for misconduct to an armed robbery of
 14 BECKMAN in Menlo Park after receiving cashier's checks from Financial Institution 1, none of which
 15 were true.

16 71. Eventually, in or about May 2024 and continuing through in or about June 2024, the
 17 GameOn board of directors learned about these communications supposedly with Financial Institution 1
 18 employees and questioned BECKMAN about them. BECKMAN continued to lie to perpetuate the
 19 scheme at a time when BECKMAN and LAU continued to raise money for GameOn from outside
 20 investors through June 2024.

21 b. Delivery of Fake Bank Statement to Financial Institution 2 Branch

22 72. On or about June 3, 2024, an Investor 1 partner serving on GameOn's board of directors
 23 arranged to go with BECKMAN to a Financial Institution 2 branch location in the Chinatown
 24 neighborhood in San Francisco, California, near GameOn's San Francisco office. Financial Institution 1
 25 was a subsidiary of Financial Institution 2. The Investor 1 partner wanted to see a statement directly
 26 from the bank to know GameOn's true account balance with Financial Institution 1. At approximately
 27 9:43 am on or about June 3, 2024, BECKMAN sent the Investor 1 partner the following message, which
 28

1 BECKMAN knew to contain false and fraudulent information:

2 Mon, Jun 3 at 9:43 AM

3 Hi - went to bank. We are still on security lock however they
4 can arrange for a statement to be available for pickup
5 today. Let's plan to meet at office and walk together to the
bank and we can grab it.

6 73. In the afternoon of June 3, 2024, BECKMAN and the Investor 1 partner arrived at the
7 Financial Institution 2 branch location and picked up an envelope from Bank Employee 1. The envelope
8 contained a statement for GameOn's account at Financial Institution 1 showing a closing balance of
9 \$13,353,194.01 as of May 31, 2024. BECKMAN knew this account statement was false and fraudulent
10 and that it did not reflect GameOn's true account balance and account activity. BECKMAN intended to
11 provide that account information, knowing the account balance, holdings, and activity to be materially
12 false, fraudulent, and misleading, to GameOn's board of directors and the investors represented on
13 GameOn's board of directors as part of the scheme to defraud. In reality, GameOn's balance in the
14 account with Financial Institution 1 was \$25.93 as of May 31, 2024. The fake account statement that
15 BECKMAN and the Investor 1 partner obtained on or about June 3, 2024, also omitted and modified
16 other account activity that actually occurred in GameOn's account in May 2024, including a \$320,000
17 wire transfer to a member of BECKMAN's family that BECKMAN knowingly caused to occur in May
18 2024. The Investor 1 partner believed the statement was real and shared pictures of it with other
19 members of GameOn's board of directors.

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1 74. The fake account statement that BECKMAN and the Investor 1 partner picked up on or
2 about June 3, 2024, was planted at Financial Institution 2 by LAU. Earlier in the day on or about June 3,
3 2024, LAU went into the same branch and met with Bank Employee 1. LAU sent the false and
4 fraudulent GameOn account statement described in paragraph 73 to Bank Employee 1 via email, asking
5 Bank Employee 1 to print it, even though LAU knew the statement to be false and fraudulent. LAU also
6 knew and intended that the false and fraudulent statement would be picked up by BECKMAN and a
7 GameOn director later that day and used as part of the scheme to defraud GameOn's board of directors
8 and investors represented on GameOn's board. LAU sent her email to Bank Employee 1 approximately
9 20 minutes before BECKMAN sent the message described in paragraph 72 to the Investor 1 partner.
10 LAU's email to Bank Employee 1 traveled through a server outside of California. Bank Employee 1
11 printed the fake statement and placed it in an envelope and kept it at the branch location until
12 BECKMAN and the Investor 1 partner picked it up later that day. Security cameras at this branch
13 captured some of the events from on or about June 3, 2024, showing BECKMAN and LAU at the
14 aforementioned branch, including the following still image of LAU arriving there on the morning of
15 June 3, 2024, before she emailed the fake account statement to Bank Employee 1:



1 75. The following day, on or about June 4, 2024, as part of the scheme to defraud,
 2 BECKMAN knowingly emailed the same fake GameOn account statement depicting an account balance
 3 of \$13,353,194.01 described in paragraphs 73 and 74 to Board Secretary 2 and CFO 1.

4 F. Other Materially False, Fraudulent, and Misleading Statements

5 76. BECKMAN and LAU knowingly and intentionally made other materially false,
 6 fraudulent, and misleading statements and representations to GameOn investors that were part of the
 7 scheme to defraud.

8 77. In or about 2020 and in or about 2021, BECKMAN knowingly and intentionally made
 9 and caused to be made materially false, fraudulent, and misleading statements to investors about
 10 BECKMAN's own experience and qualifications, including statements and representations regarding
 11 how much BECKMAN's prior company sold for to make investors believe BECKMAN had a
 12 successful prior startup exit. For example, in or about May 2021, BECKMAN told Investor 1's CFO
 13 that a company acquired BECKMAN's prior startup for "a little under 100m – cash and stock," when in
 14 truth BECKMAN knew that another company acquired BECKMAN's startup for less than \$2 million.

15 78. BECKMAN and LAU also told investors about other purported investors that were
 16 participating in GameOn's investments and particular funding rounds that BECKMAN and LAU knew
 17 were not actually participating.

18 THE SCHEME AND ARTIFICE TO DEFRAUD GAMEON

19 79. In addition to, and in furtherance of, the scheme to defraud GameOn investors,
 20 BECKMAN and LAU knowingly and intentionally devised, intended to devise, and participated in a
 21 scheme, plan, and artifice to defraud GameOn as to a material matter, and to obtain money and property
 22 from GameOn by means of materially false and fraudulent pretenses, representations, and promises, and
 23 by omission and concealment of material facts with a duty to disclose, and, for the purpose of executing
 24 such scheme or artifice and attempting to do so, did transmit, and cause to be transmitted, by means of
 25 wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and
 26 sounds.

27 80. The object of the scheme to defraud GameOn was to deprive GameOn of money in
 28 corporate accounts and divert it for BECKMAN and LAU's personal use.

1 81. As the CEO of GameOn and a member of its board of directors, BECKMAN owed
 2 fiduciary duties of care and loyalty to GameOn and its shareholders, and BECKMAN had a duty to
 3 disclose to GameOn's board and shareholders each of the actions resulting in the diversion and
 4 misappropriation of GameOn funds for BECKMAN and LAU's personal use. LAU also had duties of
 5 care and loyalty to GameOn when she acted as GameOn's attorney.

6 82. BECKMAN knowingly and intentionally used his control and authority over GameOn's
 7 bank accounts to use GameOn's funds, including funds received from investors, for BECKMAN and
 8 LAU's personal purposes and expenses. During the relevant period, BECKMAN and LAU diverted
 9 millions of dollars from GameOn's corporate accounts to spend on personal expenses unrelated to
 10 GameOn's business.

11 83. Many aspects of the scheme to defraud investors overlapped with the scheme to defraud
 12 GameOn because most of GameOn's funds that BECKMAN and LAU diverted for their own personal
 13 use came from outside investors. In addition, GameOn's board of directors included multiple investors
 14 and investor representatives, and the board received many of the false and misleading statements
 15 relating to GameOn's financials and business that BECKMAN and LAU knowingly and intentionally
 16 made and caused to be made. The allegations set forth above in the scheme to defraud GameOn
 17 investors are therefore re-alleged here and incorporated by reference.

18 84. In particular, it was part of the scheme to defraud GameOn for BECKMAN and LAU to
 19 knowingly and intentionally make and cause to be made materially false, fraudulent, and misleading
 20 statements, representations, and promises to GameOn's board of directors, officers, other employees,
 21 and contractors, and to fail to disclose material information regarding BECKMAN and LAU's use of
 22 funds with a duty to disclose. As part of the scheme to defraud GameOn, BECKMAN and LAU
 23 knowingly and intentionally created false and fraudulent documents and records, forged documents and
 24 records, and false and fraudulent email correspondence using identities of real people. For example, on
 25 or about February 9, 2024, BECKMAN sent an email to Board Secretary 2, who was also serving as
 26 GameOn's in-house counsel and Chief Operating Officer, describing a \$5 million payment from League
 27 1 that in truth did not actually exist. To further support BECKMAN's false statement to Board
 28 Secretary 2 regarding the League 1 payment, BECKMAN forwarded a 2022 email chain that contained a

1 message from League 1 Employee 1's email address stating that League 1 would be sending a \$5
 2 million wire to GameOn. At the time, BECKMAN knew that League 1 Employee 1 did not actually
 3 write that email to BECKMAN and also knew that the payment described in the email from League 1 to
 4 GameOn never was promised and never actually happened.

5 THE SCHEME TO DEFRAUD FINANCIAL INSTITUTION 4

6 85. As set forth above in paragraph 50, in connection with and as part of their schemes to
 7 defraud investors and GameOn, in or about April 2022, BECKMAN and LAU purchased residences
 8 located on [REDACTED] Street in San Francisco, California, that they paid for in cash using approximately
 9 \$4.2 million of GameOn investor funds. On or about April 13, 2022, BECKMAN told a Financial
 10 Institution 4 representative that they obtained the house on [REDACTED] Street that they wanted and “[w]e are
 11 going to need to move 4.25 from our GameOn account into our private account and then start the work
 12 on the most aggressive io loan we can have from you!!” On or about April 18, 2022, BECKMAN and
 13 LAU’s joint account with Financial Institution 4 received transfers of \$4,100,000 and \$100,000 from
 14 GameOn’s corporate account with Financial Institution 4. On or about April 18, 2022, BECKMAN and
 15 LAU’s joint account with Financial Institution 4 sent the title company approximately \$127,500 relating
 16 to the purchase of the [REDACTED] Street residences. On or about April 26, 2022, BECKMAN and LAU’s
 17 joint account with Financial Institution 4 received an additional \$100,000 from GameOn’s corporate
 18 account with Financial Institution 4. On or about April 26, 2022, BECKMAN and LAU’s joint account
 19 with Financial Institution 4 transferred an additional \$4,131,009.09 to the title company relating to the
 20 purchase of the [REDACTED] Street residences. BECKMAN and LAU knowingly caused these wire
 21 transfers. The funds that BECKMAN and LAU knowingly transferred and caused to be transferred from
 22 GameOn and that they used to purchase the [REDACTED] Street residences were GameOn investor funds that
 23 were obtained through the scheme to defraud investors and GameOn.

24 86. After purchasing the [REDACTED] Street residences in April in a cash transaction, BECKMAN
 25 and LAU began working to obtain a loan from Financial Institution 4 to put some of the money they
 26 took back in GameOn’s account with Financial Institution 4. In doing so, they devised, engaged in, and
 27 participated in a scheme to defraud Financial Institution 4 as to a material matter through false,
 28 fraudulent, and misleading statements about the source of BECKMAN and LAU’s funds used to

1 purchase the home and their authorization to use GameOn funds in the way that they did.

2 87. In the early afternoon, on or about June 8, 2022, a Financial Institution 4 representative
 3 contacted BECKMAN and LAU regarding their loan application with Financial Institution 4 in
 4 connection with the [REDACTED] Street residences, asking for a quick call to discuss questions before
 5 Financial Institution 4 submitted BECKMAN and LAU's loan for final approval.

6 88. In the early evening on or about June 8, 2022, LAU sent BECKMAN two emails within
 7 several minutes of each other, each email attaching one document that BECKMAN and LAU knew to be
 8 materially false, fraudulent, and misleading. Both attachments to LAU's emails described Minutes of
 9 the Meeting of the Board of Directors of GameOn Inc. from January 12, 2022. Both attachments
 10 included the name and electronic signature of Board Secretary 1 as well as the names of GameOn board
 11 members and observers purportedly in attendance at this GameOn board meeting. Although both
 12 attachments included Board Secretary 1's electronic signature, the two versions changed in the
 13 approximately five minutes between LAU's two emails to BECKMAN. Among other changes, LAU's
 14 first version of the minutes described a Founder Note or personal loan for GameOn founders for up to \$4
 15 million that was authorized by GameOn's board, and LAU's second version of these minutes described
 16 a Founder Note authorized by GameOn's board for up to \$5 million.

17 89. On or about June 8, 2022, at approximately 5:25 pm, less than five minutes after
 18 receiving LAU's second version of the GameOn board minutes described in paragraph 88, BECKMAN
 19 emailed the Financial Institution 4 representative with whom he had a call earlier that day. The subject
 20 line of the email was "Minutes from the BOD we discussed earlier" and BECKMAN's email attached
 21 the second version of the meeting minutes that LAU had sent BECKMAN that same evening.
 22 BECKMAN wrote the following knowingly false email to the Financial Institution 4 representative:

23 Attached please find the minutes from our Director's Meeting showing approval for founders to
 24 take out a loan - terms and timelines are spelled out in the minutes and we approved this to be
 exercisable at founder's request.

25 If you need anything else here please let me know - once we are done with this loan process I
 26 will be able to calculate interest and payback the company - so we are happy to move along
 here.

27 90. While Board Secretary 1 served as a secretary for certain other GameOn board meetings,
 28 Board Secretary 1 did not attend a GameOn board of directors meeting on or about January 12, 2022.

1 Board Secretary 1 did not apply his name and signature to minutes from the board meeting described in
 2 paragraphs 88 and 89, and he did not authorize LAU, BECKMAN, and anyone else to use his name and
 3 signature in connection with these meeting minutes. BECKMAN and LAU knew these facts at the time
 4 they created the minutes described in paragraphs 88 and 89 and sent them to Financial Institution 4.

5 91. A Founder Note was not approved by GameOn's board of directors authorizing a loan up
 6 to \$5 million to BECKMAN at the January 12, 2022 GameOn board meeting. BECKMAN and LAU
 7 knew that fact at the time they created the minutes described in paragraphs 88 and 89 and sent them to
 8 Financial Institution 4. BECKMAN and LAU also knew there was no Founder Note when they
 9 knowingly caused the wire transfers in connection with the April 2022 purchase of the [REDACTED] Street
 10 residences, as further described in paragraphs 50 and 85.

11 92. On or about June 28, 2022, BECKMAN and LAU finalized a loan with Financial
 12 Institution 4 for \$2,550,000. On or about July 6, 2022, BECKMAN and LAU's account with Financial
 13 Institution 4 transferred \$2,541,875.76 back to GameOn.

14 LAU'S DELETION AND ATTEMPTED DELETION OF RECORDS

15 93. LAU knowingly and corruptly attempted to delete, destroy, and conceal records with the
 16 intent to impair their integrity and availability for use in a grand jury investigation that was pending in
 17 the Northern District of California and that was known by, and reasonably foreseeable to, LAU.

18 94. Specifically, on or about August 8, 2024, LAU spoke to individuals working for Venture
 19 Capital Firm 1 who asked LAU about publicly reported allegations regarding BECKMAN and GameOn
 20 from an online article published in July 2024. In this meeting, LAU denied working on GameOn
 21 matters, but Venture Capital Firm 1's representatives instructed LAU to return her work laptop to
 22 Venture Capital Firm 1's offices immediately.

23 95. LAU did not immediately return her laptop to Venture Capital Firm 1 and instead first
 24 knowingly and corruptly attempted to delete hundreds of records from a folder in her personal drive with
 25 Venture Capital Firm 1 relating to GameOn and another company that LAU knew was associated with
 26 BECKMAN before returning the laptop on or about August 8, 2024. When LAU attempted to delete
 27 files related to GameOn held in her personal drive with Venture Capital Firm 1, a federal grand jury
 28 investigation relating to GameOn, BECKMAN, and LAU was pending in the Northern District of

1 California and was known by, and reasonably foreseeable to, LAU.

2 96. In a subsequent meeting that occurred between LAU and Venture Capital Firm 1's
 3 representatives on or about August 20, 2024, LAU changed her story regarding her work for GameOn
 4 from the previous meeting. LAU also knowingly and intentionally offered false excuses for attempting
 5 to delete files from her personal drive with Venture Capital Firm 1 but acknowledged doing so.

6 97. On a date unknown, LAU knowingly and corruptly deleted and caused to be deleted
 7 multiple email communications reflecting her involvement in the aforementioned schemes and offenses,
 8 including the June 3, 2024 email from LAU to Bank Employee 1 attaching the fake statement for
 9 GameOn's Financial Institution 1 account, which is described further in paragraph 74.

10 98. On a date unknown, LAU also knowingly and corruptly attempted to delete other files
 11 relating to GameOn from Venture Capital Firm 1's records and her Venture Capital Firm 1 laptop that
 12 she returned to Venture Capital Firm 1 on or about August 8, 2024, including fake GameOn invoices
 13 depicting non-customers and GameOn revenue that never existed and fake Financial Institution 1
 14 account statements showing materially inflated GameOn account balances.

15 COUNTS ONE THROUGH NINE: (18 U.S.C. §§ 1343, 2 – Wire Fraud)

16 99. Paragraphs 1 through 98 of this Indictment are re-alleged and incorporated as if fully set
 17 forth here.

18 100. Beginning on a date unknown but no later than in or about September 2018 and
 19 continuing through in or about July 2024, in the Northern District of California and elsewhere, the
 20 defendant,

21 ALEXANDER CHARLES BECKMAN,

22 knowingly and with the intent to defraud participated in, devised, and intended to devise a scheme and
 23 artifice to defraud as to a material matter, and to obtain money and property by means of materially false
 24 and fraudulent pretenses, representations, and promises, and by means of omission and concealment of
 25 material facts.

26 101. Beginning on a date unknown but no later than in or about April 2022 and continuing
 27 through in or about July 2024, in the Northern District of California and elsewhere, the defendant,

28 VALERIE LAU BECKMAN, a/k/a Valerie Lau,

1 knowingly and with the intent to defraud participated in, devised, and intended to devise a scheme and
 2 artifice to defraud as to a material matter, and to obtain money and property by means of materially false
 3 and fraudulent pretenses, representations, and promises, and by means of omission and concealment of
 4 material facts.

5 102. On or about the dates listed below, in the Northern District of California and elsewhere,
 6 for the purpose of executing the aforementioned scheme and artifice to defraud GameOn investors and
 7 attempting to do, the defendants named below did knowingly transmit and cause to be transmitted in
 8 interstate and foreign commerce, by means of a wire communication, certain writings, signs, signals,
 9 pictures, and sounds, specifically, electronic funds transfers and payments and emails, as set forth
 10 below, each transaction being a separate count:

COUNT	DATES	DEFENDANTS	APPROX. AMOUNT (IF APPLICABLE)	WIRE TRANSMISSION
1	May 21, 2021	ALEXANDER CHARLES BECKMAN	\$800,000	FEDWIRE Transfer of Funds from Investor 1's Fund to GameOn's Account with Financial Institution 3
2	November 12, 2021	ALEXANDER CHARLES BECKMAN	\$799,998.88	FEDWIRE Transfer of Funds from Investor 1's Fund to GameOn's Account with Financial Institution 3
3	January 28, 2022	ALEXANDER CHARLES BECKMAN	\$2,250,000	FEDWIRE Transfer of Funds from Investor 2's Fund to GameOn's Account with Financial Institution 3
4	July 11, 2023	ALEXANDER CHARLES BECKMAN, and VALERIE LAU BECKMAN, a/k/a Valerie Lau	\$2,000,000	FEDWIRE Transfer of Funds from Investor 3's Fund to GameOn's Account with Financial Institution 4
5	July 11, 2023	ALEXANDER CHARLES BECKMAN, and VALERIE LAU BECKMAN, a/k/a Valerie Lau	\$1,000,000	FEDWIRE Transfer of Funds from Investor 3's Fund to GameOn's Account with Financial Institution 4

6	October 23, 2023	ALEXANDER CHARLES BECKMAN, and VALERIE LAU BECKMAN, a/k/a Valerie Lau		Email from BECKMAN to GameOn Board of Directors and Observers, Including Representatives of Investor 1, Investor 4, and Investor 6, and Board Secretary 2, Attaching Fake Financial Services Company 2 Audit Report and Other Materially False and Fraudulent Financial Information and Other Information Regarding GameOn's Business
7	January 8, 2024	ALEXANDER CHARLES BECKMAN, and VALERIE LAU BECKMAN, a/k/a Valerie Lau	\$100,000	FEDWIRE Transfer of Funds from Investor 2 to GameOn's Account with Financial Institution 4
8	March 19, 2024	ALEXANDER CHARLES BECKMAN, and VALERIE LAU BECKMAN, a/k/a Valerie Lau		Email from LAU to Wealth Advisor of Investor 5 Attaching Fake Professional Services Company 2 Audit Report
9	June 3, 2024	ALEXANDER CHARLES BECKMAN, and VALERIE LAU BECKMAN, a/k/a Valerie Lau		Email from Lau to Bank Employee 1 Attaching Fake GameOn Account Statement

The wire communications described in Count 6 and Count 9 were also for the purpose of executing the aforementioned scheme and artifice to defraud GameOn and attempting to do so.

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT TEN:

(18 U.S.C. § 1349 – Conspiracy to Commit Wire Fraud Against GameOn Investors)

102 Paragraphs 1 through 98 of this Indictment are re-alleged and incorporated as if fully set

1 forth here.

2 104. Beginning on a date unknown but no later than in or about April 2022 and continuing
 3 through in or about July 2024, in the Northern District of California and elsewhere, the defendants,

4 ALEXANDER CHARLES BECKMAN, and

5 VALERIE LAU BECKMAN, a/k/a Valerie Lau,

6 did knowingly conspire to devise and intend to devise a scheme and artifice to defraud GameOn's
 7 potential and existing investors as to a material matter and to obtain money and property by means of
 8 materially false and fraudulent pretenses, representations, and promises, and by omission and
 9 concealment of material facts, specifically, by soliciting investments into GameOn through making the
 10 false and fraudulent representations as set forth in this Indictment, and, for the purpose of executing such
 11 scheme and artifice and attempting to do so, did transmit, and cause to be transmitted, by means of wire
 12 communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds,
 13 in violation of Title 18, United States Code, Section 1343.

14 All in violation of Title 18, United States Code, Section 1349.

15 COUNT ELEVEN: (18 U.S.C. § 1349 – Conspiracy to Commit Wire Fraud
 16 Against GameOn)

17 105. Paragraphs 1 through 98 of this Indictment are re-alleged and incorporated as if fully set
 18 forth here.

19 106. Beginning on a date unknown but no later than in or about April 2022 and continuing
 20 through in or about July 2024, in the Northern District of California and elsewhere, the defendants,

21 ALEXANDER CHARLES BECKMAN, and

22 VALERIE LAU BECKMAN, a/k/a Valerie Lau,

23 did knowingly conspire to devise and intend to devise a scheme and artifice to defraud GameOn as to a
 24 material matter and to obtain money and property by means of materially false and fraudulent pretenses,
 25 representations, and promises, and by omission and concealment of material facts with a duty to
 26 disclose, specifically, by making the false and fraudulent representations to GameOn's board of
 27 directors, board observers, board secretaries, officers, contractors, and employees to defraud GameOn of
 28 its money and property as set forth in this Indictment, and, for the purpose of executing such scheme and

1 artifice and attempting to do so, did transmit, and cause to be transmitted, by means of wire
 2 communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds,
 3 in violation of Title 18, United States Code, Section 1343.

4 All in violation of Title 18, United States Code, Section 1349.

5 COUNTS TWELVE THROUGH FOURTEEN: (15 U.S.C. § 78j(b) and 78ff; 17 C.F.R. § 240.10b-5
 6 – Securities Fraud; 18 U.S.C. § 2)

7 107. Paragraphs 1 through 98 of this Indictment are re-alleged and incorporated as if fully set
 8 forth here.

9 108. In or about the date ranges listed in the chart below, in the Northern District of California
 10 and elsewhere, the defendants named in the chart below willfully and knowingly, directly and indirectly,
 11 by the use of means and instrumentalities of interstate commerce, in connection with the purchase and
 12 sale of securities, used and employed manipulative and deceptive devices and contrivances by (a)
 13 employing devices, schemes, and artifices to defraud; (b) making untrue statements of material fact and
 14 omitting to state material facts necessary in order to make the statements made, in the light of the
 15 circumstances under which they were made, not misleading; and (c) engaging in acts, practices, and
 16 courses of business which operated and would operate as a fraud and deceit upon persons, specifically,
 17 the use of the above devices, schemes and artifices to defraud, false statements and omissions of
 18 material facts, and acts of fraud and deceit in connection with the following securities offerings to
 19 investors conducted during the following approximate time periods, each offering being a separate
 20 count:

COUNT	DEFENDANTS	DATES	OFFERING
12	ALEXANDER CHARLES BECKMAN	In or about September 2021 through in or about December 2022	GameOn Series B Preferred Stock Offering Offered to Investor 1, Investor 2, Investor 4, and Others
13	VALERIE LAU BECKMAN, a/k/a Valerie Lau	In or about April 2022 through in or about December 2022	GameOn Series B Preferred Stock Offering Offered to Investor 4 and Others
14	ALEXANDER CHARLES BECKMAN, and VALERIE LAU BECKMAN, a/k/a	In or about May 2023 through in or about June 2024	GameOn SAFE Offering Offered to Investor 2, Investor 3, Investor 5, and Others

1	Valerie Lau		
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3 All in violation of Title 15, United States Code, Sections 78j(b) and 78ff, Title 17, Code of
 4 Federal Regulations, Section 240.10b-5, and Title 18, United States Code, Section 2.

5 COUNT FIFTEEN: (18 U.S.C. § 371 – Conspiracy to Commit Securities Fraud)

6 109. Paragraphs 1 through 98 of this Indictment are re-alleged and incorporated as if fully set
 7 forth here.

8 110. Beginning on a date unknown but no later than in or about April 2022 and continuing
 9 through in or about July 2024, in the Northern District of California and elsewhere, the defendants,

10 ALEXANDER CHARLES BECKMAN, and

11 VALERIE LAU BECKMAN, a/k/a Valerie Lau,

12 did knowingly and willfully conspire and agree together and with each other to commit offenses against
 13 the United States, namely securities fraud, in violation of Title 15, United States Code, Sections 78j(b)
 14 and 78ff, and Title 17, Code of Federal Regulations, Sections 240.10b-5.

15 111. It was a part and an object of the conspiracy that defendants BECKMAN and LAU
 16 knowingly and willfully, directly and indirectly, by the use of the means and instrumentalities of
 17 interstate commerce would and did use and employ, in connection with the purchase and sale of
 18 securities, manipulative and deceptive devices and contrivances in violation of Title 17, Code of Federal
 19 Regulations, Section 240.10b5-5 by: (a) employing devices, schemes, and artifices to defraud; (b)
 20 making untrue statements of material fact and omitting to state material facts necessary in order to make
 21 the statements made, in light of the circumstances under which they were made, not misleading; and (c)
 22 engaging in acts, practices and courses of business which operated and would operate as a fraud and
 23 deceit upon persons, all in violation of Title 15, United States Code, Sections 78j(b) and 78ff, and Title
 24 17, Code of Federal Regulations, Sections 240.10b-5.

25 112. In furtherance of the conspiracy and to effect the objects of it, defendants BECKMAN
 26 and LAU committed the following overt acts, among others, in the Northern District of California and
 27 elsewhere:

28

- 1 a. On or about June 27, 2023, BECKMAN sent an email to an Investor 3 partner,
2 copying LAU and others, attaching a fake bank statement for GameOn's account with
3 Financial Institution 1 that included false and fraudulent representations regarding
4 GameOn's revenue from League 1.
- 5 b. On or about October 19, 2023, BECKMAN sent LAU via email an audit report for
6 GameOn's 2022 financial statements purportedly authored by Professional Services
7 Company 2. BECKMAN created this false and fraudulent audit report by modifying
8 the Genuine Professional Services Company 2 Audit Report that LAU had sent
9 BECKMAN by email on or about July 27, 2023.
- 10 c. On or about October 23, 2023, BECKMAN sent LAU an email with the subject line
11 "attached please take look," attaching the Fake Professional Services Company 2
12 Audit Report along with other GameOn board materials containing false and
13 fraudulent information about GameOn.
- 14 d. On or about October 23, 2023, and before BECKMAN distributed the Fake
15 Professional Services Company 2 Audit Report to anyone else, BECKMAN emailed
16 LAU and attached the Genuine Professional Services Company 2 Audit Report that
17 LAU had previously sent BECKMAN on or about July 27, 2023.
- 18 e. On or about October 23, 2023, BECKMAN emailed the Fake Professional Services
19 Company 2 Audit Report to GameOn's board of directors and board observers,
20 including representatives of Investor 1, Investor 4, and Investor 6, blind copying LAU
21 and his own personal email address on the correspondence.
- 22 f. On or about March 19, 2024, LAU sent an email to a wealth advisor for Investor 5,
23 who was considering an investment in GameOn's SAFE Offering, that attached the
24 Fake Professional Services Company 2 Audit Report.
- 25 g. On or about April 22, 2024, BECKMAN sent an email to a potential investor in
26 GameOn's SAFE Offering attaching the Fake Professional Services Company 1
27 Audit Report. LAU was copied on BECKMAN's email.

h. On or about May 17, 2024, BECKMAN sent an email to a potential investor in GameOn's SAFE Offering attaching the Fake Professional Services Company 2 Audit Report. LAU was copied on BECKMAN's email.

All in violation of Title 18, United States Code, Section 371.

COUNT SIXTEEN: (18 U.S.C. § 1349 – Conspiracy to Commit Bank Fraud)
113. Paragraphs 1 through 98 of this Indictment are re-alleged and incorporated as if fully set forth here.

114. Beginning on a date unknown, but no later than in or about April 2022, and continuing through in or about July 2022, in the Northern District of California and elsewhere, the defendants,

ALEXANDER CHARLES BECKMAN, and

VALERIE LAU BECKMAN, a/k/a Valerie Lau,

12 did knowingly conspire to devise and intend to devise a scheme and artifice to defraud Financial
13 Institution 4, which was a financial institution insured by the Federal Deposit Insurance Corporation, as
14 to a material matter and to obtain moneys, funds, credits, assets, and other property owned by, and under
15 the custody and control of Financial Institution 4 by means of materially false and fraudulent pretenses,
16 representations, and promises, and by omission and concealment of material facts, in violation of Title
17 18, United States Code, Section 1344. In sum and substance, BECKMAN and LAU knowingly
18 conspired and intended to devise a scheme to defraud Financial Institution 4 in connection with
19 BECKMAN and LAU's purchase of personal residences located at [REDACTED] [REDACTED] Street, San
20 Francisco, California [REDACTED], and in connection with a loan from Financial Institution 4 relating to the
21 purchase of the aforementioned residences with materially false, fraudulent, and misleading information
22 about (1) BECKMAN and LAU's source of funds to purchase the aforementioned residences, (2) an
23 investor fraud scheme that generated those funds, (3) the GameOn board of directors' authorization of
24 BECKMAN's use of GameOn's corporate funds for a personal loan up to \$5 million, and (4) meeting
25 minutes bearing the name and electronic signature of Board Secretary 1 and the names of members of
26 GameOn's board of directors.

All in violation of Title 18, United States Code, Section 1349.

11

1 COUNT SEVENTEEN: (18 U.S.C. §§ 1014, 2 – False Statements to a Bank or
 2 Other Federally Insured Institution)

3 115. Paragraphs 1 through 98 of this Indictment are re-alleged and incorporated as if fully set
 4 forth here.

5 116. Between in or about April 2022 and continuing through in or about July 2022, in the
 6 Northern District of California and elsewhere, the defendants,

7 ALEXANDER CHARLES BECKMAN, and

8 VALERIE LAU BECKMAN, a/k/a Valerie Lau,

9 knowingly made false statements for the purpose of influencing the action of Financial Institution 4,
 10 which was a financial institution insured by the Federal Deposit Insurance Corporation, in connection
 11 with BECKMAN and LAU's application for a loan and financial transactions relating to the acquisition
 12 of personal residences by BECKMAN and LAU, specifically, BECKMAN and LAU knowingly made
 13 what they knew were false and misleading statements and representations to Financial Institution 4
 14 regarding (1) BECKMAN and LAU's source of funds to purchase personal residences located at [REDACTED]

15 [REDACTED] Street, San Francisco, California [REDACTED], (2) an investor fraud scheme that generated those
 16 funds, (3) the GameOn board of directors' authorization of BECKMAN's use of GameOn's corporate
 17 funds for a personal loan up to \$5 million, and (4) meeting minutes bearing the name and electronic
 18 signature of Board Secretary 1 and the names of members of GameOn's board of directors.

19 All in violation of Title 18, United States Code, Sections 1014 and 2.

20 COUNT EIGHTEEN: (18 U.S.C. §§ 1957, 2 – Engaging in Monetary
 21 Transactions in Property Derived from Specified Unlawful
 Activity)

22 117. Paragraphs 1 through 98 of this Indictment are re-alleged and incorporated as if fully set
 23 forth here.

24 118. Among other transactions, on or about April 26, 2022, in the Northern District of
 25 California and elsewhere, the defendants,

26 ALEXANDER CHARLES BECKMAN, and

27 VALERIE LAU BECKMAN, a/k/a Valerie Lau,

28 did knowingly engage in monetary transactions by, through, and to a financial institution insured by the

1 Federal Deposit Insurance Corporation, in and affecting interstate and foreign commerce, in criminally
 2 derived property of a value greater than \$10,000, such funds having been derived from specified
 3 unlawful activity, that is wire fraud and wire fraud conspiracy, as alleged in Counts One through Eleven,
 4 specifically, a wire transfer of approximately \$4,131,009.09 to a title company in connection with the
 5 defendants' purchase of residences located at [REDACTED] [REDACTED] Street, San Francisco, California
 6 [REDACTED].

7 All in violation of Title 18, United States Code, Sections 1957 and 2.

8 COUNTS NINETEEN THROUGH TWENTY-FOUR: (18 U.S.C. §§ 1028A(a)(1), (c)(4), and
 9 (c)(5), and 2 – Aggravated Identity Theft)

10 119. Paragraphs 1 through 98 of this Indictment are re-alleged and incorporated as if fully set
 11 forth here.

12 120. On or about the dates listed below, in the Northern District of California and elsewhere,
 13 the defendants named in the chart below did knowingly use, without lawful authority, the means of
 14 identification of another person, specifically, the means of identification listed in the table below, during
 15 and in relation to the felony violations described in the chart below, each person described in the chart
 16 being a separate count:

COUNT	DEFENDANTS	DATES	MEANS OF IDENTIFICATION	DURING AND IN RELATION TO
19	ALEXANDER CHARLES BECKMAN, and VALERIE LAU BECKMAN, a/k/a Valerie Lau	On or about June 8 and 9, 2022	Board Secretary 1's name and electronic signature	Conspiracy to Commit Bank Fraud, as alleged in Count 16, and False Statements to a Bank or Other Federally Insured Institution, as alleged in Count 17
20	ALEXANDER CHARLES BECKMAN	In or about February 2023 through in or about June 2024	Contractor 1's name, initials, and an email address and emails using Contractor 1's name and initials	Wire Fraud and Conspiracy to Commit Wire Fraud, as alleged in Counts 1-11
21	ALEXANDER CHARLES BECKMAN	In or about October 2023, and continuing through in or about April 2024	CFO 1's name, initials, and an email address and emails using CFO 1's name and initials	Wire Fraud and Conspiracy to Commit Wire Fraud, as alleged in Counts 1-11

1				
2	22	ALEXANDER CHARLES BECKMAN	On or about February 9, 2024	League 1 Employee 1's name and email address
3	23	ALEXANDER CHARLES BECKMAN	On or about April 10, 2024, and continuing through on or about April 19, 2024	Financial Advisor 1's name, initials, and email addresses and emails using Financial Advisor 1's name and initials
4	24	ALEXANDER CHARLES BECKMAN	On or about April 17, 2024, and continuing through on or about May 27, 2024	Financial Advisor 2's name, initials, and an email address and emails using Financial Advisor 2's name and initials
5				
6				
7				
8				
9				
10				

11 All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(4), and (c)(5) and 2.

12 COUNT TWENTY-FIVE: (18 U.S.C. § 1512(c)(1) – Obstruction of Justice)

13 121. Paragraphs 1 through 98 of this Indictment are re-alleged and incorporated as if fully set
14 forth here.

15 122. Between on or about August 8, 2024, and on or about August 20, 2024, in the Northern
16 District of California, the defendant,

17 VALERIE LAU BECKMAN, a/k/a Valerie Lau,
18 did knowingly and corruptly alter, destroy, mutilate, and conceal records, documents, and other objects,
19 and attempt to do so, with the intent to impair their integrity and availability for use in an official
20 proceeding, namely, a federal grand jury investigation that was pending in the Northern District of
21 California.

22 All in violation of Title 18, United States Code, Section 1512(c)(1).

23 FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c); 18 U.S.C.
24 §§ 982(a)(1), 982(a)(2))

25 123. The allegations contained in this Indictment are re-alleged and incorporated by reference
26 for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C),
27 Section 982(a)(1), 982(a)(2), and Title 28, United States Code, Section 2461(c).

1 124. Upon conviction for any of the offenses set forth in Counts 1 through 17 of this
2 Indictment, the defendants,

ALEXANDER CHARLES BECKMAN and,

VALERIE LAU BECKMAN, a/k/a Valerie Lau,

5 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and
6 Title 28, United States Code, Section 2461(c), all property, real or personal, constituting, or derived
7 from proceeds the defendants obtained directly and indirectly, as the result of those violations, including
8 but not limited to the following:

- a. The residences and real property located at [REDACTED] [REDACTED] Street, San Francisco, California [REDACTED];
- b. One black Tesla Model X with Falcon Wing doors and Vehicle Identification Number 7SAXCBE6XNF329766; and
- c. One black Apple iPhone and one Apple laptop bearing serial number GHXVFK2OOL, both of which were voluntarily given to the FBI on July 15, 2024.

5 125. Upon conviction of the offense set forth in Count 18 of this Indictment, the defendants,

ALEXANDER CHARLES BECKMAN and,

VALERIE LAU BECKMAN, a/k/a Valerie Lau,

18 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all
19 property, real or personal, constituting, or derived from proceeds the defendants obtained directly and
20 indirectly, as the result of those violations, including but not limited to the following:

a. The residences and real property located at [REDACTED] [REDACTED] Street, San Francisco, California [REDACTED].

23 126. Upon conviction of any of the offenses set forth in Counts 19 through 24 of this
24 Indictment, the defendants,

ALEXANDER CHARLES BECKMAN and,

VALERIE LAU BECKMAN, a/k/a Valerie Lau,

27 shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 982(a)(2) and
28 981(a)(1)(C), any property constituting or derived from proceeds the defendant obtained, directly or

1 indirectly, as the result of such violation and any personal property used or intended to be used to
2 commit, or facilitate the commission, of the offense.

3 127. If any of the property described above, as a result of any act or omission of the
4 defendants:

5 a. cannot be located upon exercise of due diligence;
6 b. has been transferred or sold to, or deposited with, a third party;
7 c. has been placed beyond the jurisdiction of the court;
8 d. has been substantially diminished in value; or
9 e. has been commingled with other property which cannot be divided without
10 difficulty,

11 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
12 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

13 All pursuant to Title 18, United States Code, Section 981(a)(1)(C); Title 28, United States Code,
14 Section 2461(c); Title 18, United States Code, Section 982(a)(1); Title 18, United States Code, Section
15 982(a)(2); and Federal Rule of Criminal Procedure 32.2.

16
17 DATED: January 21, 2025

A TRUE BILL.

18
19 _____
20 FOREPERSON
21

22 PATRICK D. ROBBINS
23 Attorney for the United States
24 Acting Under Authority Conferred by 28 U.S.C. § 515

25 _____
26 /s/ Patrick O'Brien
27 PATRICK K. O'BRIEN
28 Assistant United States Attorney

Exhibit B

EXHIBIT B

The land referred to is situated in the County of San Francisco, City of San Francisco, State of California, and is described as follows:

Beginning at a point on the Southerly fine of Jackson Street, distant thereon 100 feet Easterly from the corner formed by the intersection of the Southerly line of Jackson Street with the Northeasterly line of Arguello Boulevard (formerly called First Avenue), running thence Easterly along said line of Jackson Street 27 feet; thence Southwesterly on a line parallel with said line of Arguello Boulevard (formerly called First Avenue) 128 feet 4 inches; thence Westerly on a line parallel with said line of Jackson Street 27 feet; thence Northeasterly on a line parallel with said line of Arguello Boulevard (formerly called First Avenue) 128 feet 4 inches to the point of beginning.

Being a portion of Western Addition Block No. 850

Assessor's Lot 019; Block 0990